

January 29, 2025

VIA ECF

Honorable Judge Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Case No. 1:24-cv-03713, *Metro Light & Power LLC v. Furnlite Inc.*
Case No. 1:24-cv-09981, *Group Dekko, Inc. and Furnlite Inc. v. Metro Light & Power, LLC*

Dear Judge Subramanian:

Pursuant to your order at ECF No. 43, the Parties write to provide the Court with an update on their meet and confer efforts and a proposal for ongoing case management.

Meet and Confer

On Monday, January 27, 2025, lead counsel for each party¹, and primary decisions makers for each party², participated in a video call lasting over 45 minutes. The parties discussed their respective positions, but did not reach any agreements. The Parties believe that the case should move forward on the merits.

Proposed Next Steps

The Parties propose that Group Dekko, Inc. and Furnlite, Inc. agree to voluntarily withdraw the declaratory judgment action, Case No. 1:24-cv-09981, and it be dismissed without prejudice.

The Parties propose that the stay in Case No. 1:24-cv-03713 be lifted. The Parties propose that Metro be given leave to file an amended complaint prior to filing of any further pleading or motion, and it be permitted to add Group Dekko as a defendant.

¹ For Furnlite and Dekko, Anthony J. Davis, Charles Heiny, and Todd Taylor participated. For Metro, Danielle Healey, Elisha Kobre, and Anna Schuler participated.

² For Metro, Founder, President, and CEO Daniel Deutsch participated. For Dekko, CEO Shawn Campbell and CFO Chris Baron participated.

January 29, 2025

Page 2

The Parties propose the following Case Management Schedule:

Item	Proposed Date:
Amended Pleadings without leave by:	2/28/2025
First RFP served by:	3/3/2025
Interrogatories per local rule by:	3/3/2025
Responsive Pleadings by:	3/28/2025
Joinder of parties by:	4/11/2025
Expert disclosures for proponent of claim by:	4/25/2025
RFAs served by:	5/2/2025
Expert disclosures for opponent of claim by:	5/15/2025
All depositions completed by:	6/15/2025
All discovery to be completed by:	6/15/2025
Post discovery summary judgment motions by:	7/18/2025
Answering summary judgment papers by:	8/15/2025
Reply summary judgment papers by:	8/29/2025

The Parties look forward to discussing further at the conference on February 12, 2025.

Respectfully submitted,

Elisha J. Kobre
 Sheppard Mullin Richter & Hampton, LLP
 2200 Ross Ave., 20th Fl.
 Dallas, TX 75201
 Email: ekobre@sheppardmullin.com
 Telephone 469-391-7412
 Facsimile 469-391-7401

Anthony J. Davis
 Santomassimo Davis LLP
 450 Seventh Avenue
 Suite 2205
 New York, NY 10123
 Phone: 201-712-1616
 Fax: 201-712-9444
 Email: adavis@ogcsolutions.com

Attorneys for Furnlite, Inc. and Group Dekko, Inc.

Danielle Joy Healey
 SPENCER FANE LLP
 3040 Post Oak Boulevard, Suite 1400
 Houston, Texas 77056
 Telephone (713) 212-2697
 Facsimile (713) 963-0859
 Email: dhealey@spencerfane.com

Anna G. Schuler
 SPENCER FANE LLP
 6201 College Blvd., Ste. 500
 Overland Park, KS 66201
 Telephone (816) 292-8000
 Email: aschuler@spencerfane.com

Attorneys for Plaintiff Metro Light and Power LLC